

Resource Criteria and Evaluation

National Park Service Management Policies (1988) outline the criteria by which areas are evaluated for inclusion in the national park system and stipulate the following:

To be eligible for favorable consideration as a unit of the national park system, an area must (1) possess nationally significant natural, cultural, or recreational resources, (2) be a suitable and feasible addition to the system, and (3) require direct NPS management instead of alternative protection by other agencies or the private sector. These criteria are designed to ensure that the national park system includes only outstanding examples of the nation's natural, cultural and recreational resources. They also recognize that inclusion in the national park system is not the only option for preserving the nation's outstanding resources (Chap. 2:1-2).

The *NPS Criteria for Parklands* (1990) were used to determine whether the Moccasin Bend site qualified for inclusion as a unit of the national park system. The site has been evaluated according to those criteria as described below.

SIGNIFICANCE

The Moccasin Bend Archeological District was designated a national historic landmark in 1986 because it possesses exceptional value in illustrating or interpreting the history of the United States. Since Moccasin Bend contains important and numerous American Indian and Civil War era archeological resources, it has been identified, evaluated, and recognized as being nationally significant to American Indian and U.S. military history.

The Moccasin Bend Archeological District constitutes the best preserved and most important compact, diverse sample of archeological remains known in the Tennessee River valley. It is ideally situated to be easily and rigorously protected for the long term and has the highest potential for rich and varied high-volume public interpretation

and display of its contents of any known archeological resource in the United States. Considered as a whole, the American Indian portion of Moccasin Bend is the best intact concentration of archeological resources known to exist in the entire main 650-mile Tennessee River valley. The Moccasin Bend archeological resources offer a potential of national demonstration quality for coordinated scientific research, historic preservation, public education, and deep appreciation of America's history. The quality, diversity, and broad accessibility of these archeological resources cannot be matched with any other American metropolitan area.

The extant earthworks of the Battle of Chattanooga within the Moccasin Bend Archeological District (cannon emplacements, rifle pits, bivouac pads and areas, and tortuous access roads) are the best preserved of all physical remnants of the important Battle of Chattanooga and the only recognized unit of Union army gun emplacements, trenches, and support areas remaining extant from that costly campaign.

Under the *NPS Management Policies and Criteria for Parklands*, the Moccasin Bend Archeological District meets the following criteria for significance:

- It is an outstanding example of a site that has and can reveal new information on American Indian history over several thousand years. The site is especially important in adding new information about the Euro-American contact period. The site also contains pristine Civil War era artillery earthworks as well as support resources that played a key role in the Chattanooga campaign.
- It possesses exceptional value in illustrating or interpreting the cultural themes of our nation's heritage — in this case, American Indian history as well as Civil War activities during the Chattanooga campaign.
- It offers superlative opportunities for public education and archeological research.

- It retains a high degree of integrity as a true and accurate example of the resource, due to the exceptional archeological resources still present at the site and its research potential. This degree of integrity was confirmed in the national historic landmark nomination. There have been no substantive changes to the landscape since the 1986 national historic landmark nomination that affects that integrity. It is recognized that the site contains a number of uses incompatible with an NPS designation, but the uses currently do not diminish Moccasin Bend's significant archeological resources.

In conclusion, the Moccasin Bend site complies with the criterion of national significance that must be met before a historic site can be considered for inclusion within the national park system.

SUITABILITY

An area that is nationally significant must also meet criteria for suitability to qualify as a potential addition to the national park system.

To be suitable for inclusion in the system an area must represent a natural or cultural theme or type of recreational resource that is not already adequately represented in the national park system or is not comparably represented and protected for public enjoyment by another land-managing entity. Adequacy of representation is determined on a case-by-case basis by comparing the proposed area to other units in the national park system for differences or similarities in the character, quality, or combination of resources, and opportunities for public enjoyment.

Under the *Revisions of the National Park Service's Thematic Framework* (1996), Moccasin Bend is representative of the following themes (topics that help define the themes are also included):

- I. PEOPLING PLACES
 - Family and the Life Cycle
 - Health, Nutrition, and Disease
 - Migration from Outside and Within
 - Community and Neighborhood
 - Ethnic Homelands
 - Encounters, Conflicts, and Colonization

IV. SHAPING THE POLITICAL LANDSCAPE

Military Institutions and Activities

V. DEVELOPING THE AMERICAN ECONOMY

Extraction and Production
Distribution and Consumption
Transportation and Communication
Workers and Work Culture
Exchange and Trade

VII. TRANSFORMING THE ENVIRONMENT

Manipulating the Environment and Its Resources
Protecting and Preserving the Environment

The National Park Service administers numerous archeological sites throughout the United States. There are only three NPS archeological units located east of the Mississippi River in relative proximity — Russell Cave National Monument, Ocmulgee National Monument, and Hopewell Culture National Historical Park. There are two other NPS units containing American Indian archeological resources. They are Shiloh Indian Mounds National Historic Landmark located at Shiloh National Military Park and several mounds and village sites along the Natchez Trace Parkway in Mississippi, but only Emerald Mounds is listed as a national historic landmark. Just west of the Mississippi River is Effigy Mounds National Monument. Russell Cave National Monument and Ocmulgee National Monument are located in the general region of Moccasin Bend, and for varying technical reasons do not duplicate the known and currently undeveloped archeological values at Moccasin Bend. Most archeologically based NPS areas are located in the Southwest. The pre-contact American Indian cultures of the eastern United States are underrepresented.

State historic preservation entities in this region manage a number of Mississippian culture period mounds sites. These include the following: Pinson Mounds State Archeological Area in west-central Tennessee; Chucalissa Archeological Museum, south of Memphis; Etowah Indian Mounds State Historic Site in northern Georgia; Kolomoki Mounds State Historical Park near Blakely, Georgia; Moundville Archeological Park, near Tuscaloosa, Alabama; the Bottle Creek Site, northeast of Mobile, Alabama; Cahokia Mounds State Historic Site, Carbondale, Illinois; the

Grand Village of the Natchez Indians in Natchez, Mississippi; and Poverty Point and Marksville State Commemorative Areas in Louisiana. These state sites are national historic landmarks. These sites are protected, managed, and interpreted according to applicable state policies and guidelines. There are a number of other Mississippian culture period mounds sites that are managed by state, local, and academic entities throughout this region.

Although prehistoric sites based on various themes are represented in the national park system, none of the designated units possesses the extensive range of excavated archeological resources as well as unexcavated subsurface resources for which Moccasin Bend is significant — an almost continuous 10,000-year occupation of the site in the southeastern United States. This length of continuous cultural occupation is not duplicated anywhere else within the national park system. The one exception of a comparable chronological occupation is Russell Cave National Monument with a proven 8,000-year range. Russell Cave is a shelter cave that does not offer, when compared to Moccasin Bend, the larger occupation areas and population base that occupied the various sites and complexes along the banks of the Tennessee River.

The presence of the nationally significant Civil War period resources on Stringers Ridge enhances the interpretive story presented at nearby Chickamauga and Chattanooga National Military Park. A short segment of the Trail of Tears National Historic Trail is said to have traversed Moccasin Bend north and outside the study area. (Its precise location has not been confirmed.) The earlier old Federal Road followed this route. The Tennessee River, which surrounds Moccasin Bend, is the designated water route of the Trail of Tears National Historic Trail. Then, too, the Brown's Ferry site is located outside the study area.

In conclusion, none of the other federal or state parks can match the extensive chronological occupation of Moccasin Bend as well as the rich, diverse, and complex cultural resource base. Moccasin Bend is considered to be suitable as a potential addition to the national park system.

FEASIBILITY

An area that is nationally significant and meets suitability criteria must also meet feasibility criteria to qualify as a potential addition to the national park system.

To be feasible as a new unit of the national park system, an area's natural systems and/or historic settings must be of sufficient size and appropriate configuration to ensure long-term protection of the resources and to accommodate public use. It must have potential for efficient administration at a reasonable cost. Important feasibility factors include landownership, acquisition costs, access, threats to the resource, and staffing or development requirements.

Size, Configuration, and Access

The designated 956-acre national historic landmark tract is of sufficient size and configuration to ensure adequate resource protection and to provide space to present and to interpret Moccasin Bend's resource values to future visitors. The site is close to the central business district of Chattanooga and is directly accessible by road and water with the potential for utilizing electric buses and watercraft. There have been proposals for expansion of the Chattanooga Riverwalk, which would provide pedestrian and bicycle access.



Moccasin Bend and downtown Chattanooga, Tennessee. Viewed from Point Park on Lookout Mountain.

Landownership

Moccasin Bend is under the primary jurisdiction of the city of Chattanooga and Hamilton County government (600 acres) and the state of Tennessee (334 acres). Star City Development Corporation (WDEF radio) owns a 12.7-acre tract in fee-simple, and there is one 8.5-acre parcel that is a private residence. Since most of the site is in public ownership, the publicly owned acreage could be available for timely transfer from those entities. The acquisition of several privately owned inholdings would be subject to acquisition authority utilized by the city of Chattanooga and Hamilton County and the state of Tennessee, and then turned over to the National Park Service.

While the Moccasin Bend Archeological District is nationally significant regardless of the present land uses, it is not feasible to be managed as a unit of the national park system with these current uses continuing. Providing visitors a quality experience in a landscape reminiscent of its past is currently not possible. In order to comprehensively protect archeological resources and provide for additional research opportunities, the present uses should be removed. Finally, tourists would visit Moccasin Bend in larger numbers if it looked and felt like a unit of the national park system.

Threats to the Resource

Although not heavily developed, Moccasin Bend has experienced a number of land-disturbing activities in the past, including agriculture, Civil War activities, and 20th century construction. The following changes and/or disturbances have occurred since 1950:

- The Moccasin Bend Mental Health Hospital, a state facility, was developed within the 334 acres of the site in 1960–61 and subsequent years.
- The city of Chattanooga leased the Moccasin Bend Golf Course for development in the 1960s, which is currently under a lease agreement with a private party until the year 2005.
- Extensive soil removal of the riverbank along the southern end of the bend occurred in 1963 to permit moving the Tennessee River to accommodate the construction of an

interstate highway on the opposite shore. A strip of riverbank approximately 5,500 feet long and 125–250 feet wide was dredged away, slurried, and pumped onto the southern portion of the bend. The spoil material was then deposited in the upper portion of Moccasin Bend near the present-day radio towers.

- Three underground petroleum pipelines owned by Colonial Pipeline carried in two 50-foot-wide rights-of-way cross Moccasin Bend. An underground force main connecting to the new regional sewage treatment plan (originally developed in 1952) on Moccasin Bend was installed on the south edge of the golf course in 1983. Overhead electrical transmission lines originally erected in 1908 were moved in 1985 by the Chattanooga Electric Power Board, a city agency, to a 150-foot-wide right-of-way through the site.
- Four 5,000 watt transmission towers for radio station WDEF have been operating since the 1950s. They are located on a 12.7-acre parcel of land owned in fee simple by the Star City Development Corporation (WDEF radio).
- A model airplane flying facility operated by the Chattanooga Radio Control Club is located on land owned by the city and county.
- A law enforcement firearm training range operated jointly by the Hamilton County Sheriff's Department and the Chattanooga Police Department for 10.5 months a year.
- Streambank erosion, especially during periods of high water, threatens the law enforcement firearm training range, archeological resources on the south and west sides of the bend, and hole #13 at the golf course.
- A series of internal paved and unimproved roads and offroad paths including Moccasin Bend Road have impacted Moccasin Bend.

American Indian and Civil War sites have been looted by pothunters, although the presence of the Native American Reserve Force has nearly eliminated these threats in the past several years. Looters have dug over 1,200 holes in and near

Moccasin Bend archeological sites, but these activities have not impaired or destroyed the key resources for which the site is nationally significant. The possibility of further commercial development of the remaining acreage of the national historic landmark remains a possibility, which could alter its integrity.

In conclusion, Moccasin Bend would be feasible for inclusion in the national park system once the incompatible uses and any hazardous wastes are removed according to the phasing plan presented in the “Alternatives” section under alternative 2, and at no cost to the National Park Service. Since the final test of feasibility of Moccasin Bend rests upon the timely removal of all incompatible uses

and development by the proposed park’s major partners, binding commitments would have to be made by the city, county, and state to accomplish specified actions to clear the site. These commitments would include sufficient sums of appropriated funds that are linked to a specified, mutually agreed upon timetable. Such commitments could be included in the enabling legislation to ensure that incompatible uses are removed so that a unit of the national park system can be established. The success of this project rests on the major partners reversing incompatible development at Moccasin Bend in order to transfer to the National Park Service a land base that closely resembles the situation existing at the time of the 1950 legislation.



Planning team viewing bank erosion.